

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BEVERLY SOMAI, et al.

Plaintiffs,

vs.

CITY OF BEDFORD,

Defendant.

CASE NO. 1:19-CV-00373

MAGISTRATE JUDGE
KATHLEEN B. BURKE

JOINT STATUS REPORT REGARDING DISCOVERY DISPUTE

After a March 4, 2020 discovery conference the Court ordered the parties to meet and confer, agree on a path to obtain the supplemental document production Plaintiffs are seeking from Defendant's records provider, and file this Joint Status Report. ECF No. 48. The subject of the parties' dispute is a spreadsheet containing data about calls to the City of Bedford Police.

The parties met on March 4 to discuss the supplemental production. The parties agreed Plaintiffs would request the below information from Defendant's records provider; the parties would copy each other on communications with the provider; and the parties would collaborate to obtain the complete production. Plaintiffs are requesting:

1. A key explaining the categories of information in the spreadsheet;
2. A list of the total available codes that could populate the "call type" column in the spreadsheet, including a clarification of whether there is a specific code that indicates a relationship to the Ordinance Plaintiffs are challenging in this litigation;
3. An additional column of data that was omitted from the original production, reflecting later-added police notes for years in which the City was using a version of the records software that enabled the later-added feature; and

4. A complete production of race- and sex- identifier data, to the extent it was not already produced.

The parties agreed that the responses to these questions may generate necessary follow-up supplementation from the records provider and they will work together to obtain that, also. Finally, the parties agreed that they will jointly work with Defendant's records provider to obtain an affidavit detailing the methodology by which the data spreadsheet was produced.

The parties are currently working with the records provider to complete this and expect to do so before the new discovery cutoff, March 20.

Respectfully submitted,

/s/ Kallen Boyer

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CERTIFICATE OF SERVICE

I certify that on March 6, 2020, I filed the foregoing using the Court's CM/ECF system, and that all parties will be served with a copy via that system.

/s/ Elizabeth Bonham
Elizabeth Bonham (0093733)